

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
Atlanta Division**

ELCINDA PERSON,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:19-cv-03735-SDG
)	
TRAINING SERVICES, INC.)	
d/b/a AVIATION INSTITUTE)	
OF MAINTENANCE,)	
)	
<u>Defendant.</u>)	

**MOTION TO DISMISS FOR
LACK OF SUBJECT-MATTER JURISDICTION**

Defendant Technical Education Service, Inc. d/b/a Aviation Institute of Maintenance (“TES”) moves to dismiss Plaintiff’s Amended Complaint pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure. In support of this Motion, TES relies upon the facts and legal contentions set forth in the accompanying Memorandum filed in Support, any reply brief which may be filed, and any arguments TES may make at the hearing before this Court regarding this Motion.

Respectfully submitted this 5 November 2020.

/s/ Milena Radovic
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Georgia Bar No. 375618

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CERTIFICATION

In accordance with Civil Local Rules 5.1C and 7.1D, I hereby certify that this document has been prepared in 14 point, Times New Roman font.

/s/ Milena Radovic
Milena Radovic

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CERTIFICATE OF SERVICE

I hereby certify that on November 5, 2020, I electronically filed the foregoing
**MOTION TO DISMISS FOR LACK OF SUBJECT-MATTER
JURISDICTION** with the Clerk of Court using the CM/ECF system, which will
automatically serve the following counsel of record:

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/s/ Milena Radovic
Milena Radovic